

August 14, 2000

U.S. Army Corps of Engineers
Sacramento District Planning Division
1325 J Street, Sacramento, CA 95814-2922

Attention: Nina Bicknese

RE: Draft General Re-Evaluation Report/Environmental Impact Report and Supplemental Environmental Impact Statement (draft report) for Proposed Modifications to the Guadalupe River Project, Downtown San Jose, California (project).

Dear Nina,

As a postscript to the four pages I faxed to you last week, please consider the enclosed data charts on stream flow and temperature for the Guadalupe River in downtown San Jose, at the USGS gage at the St. John Street Bridge, and pictures that have been taken in the project area.

It is difficult to analyze graphs and charts of derivative data if the data itself is not presented as a frame of reference. If the data used is not truly representative of base conditions in the river then any amount of statistical manipulation is not going to make it valid. Water supply management, groundwater cleanup pumping, and another third of the Guadalupe watershed are not assessed in this EIR, and are basic to the readings that are found at the USGS gage for the past 70 years.

Chart I is a compilation of readings from the St. John Street USGS gage from 1929 to 1961, that shows the mean cfs flows for each month, the days that actually had flows, and the acre feet of water that passed through the gage for that given year. This chart is important because it shows the flashy nature of the Guadalupe River flows, more than half the year there are no flows at all and yet for anadromous fish there are at least two or three months that have sustainable storm events. Some of these storm events are almost completely captured by the reservoirs but in this earlier time frame the Lexington Reservoir was not capturing all Los Gatos Creek. 1941-1943 flows are spread out throughout the year it appears as managed artificially but the other years are more indicative of natural conditions in the watershed, until the latter part of the 1950's when more conservative manipulation takes over again.

LUCAS2-1

The second chart shows the Santa Clara Valley Water Conservation District Hydrologic Data for two thirds of this 'baseline' period and illustrates the volume of water entering the Upper Guadalupe River and Los Gatos Creek from their watersheds on the eastern and western sides of Mount Umunhum, how much was percolated naturally into the streams and how much into the Santa Clara Valley Water Conservation District facilities. There is more extensive reservoir storage and diversion data but this is the overall chart that shows the diminishing volume of stream flows to the S.F. Bay. Has this base data been incorporated into the flow statistics presented in this EIR? Is there any distinguishing of Upper Guadalupe River flows and Los Gatos Creek flows?

The beneficial instream uses for water supply must be addressed as well as base flows for the indicator anadromous fish populations. Is this comparison of ongoing demands of these essential instream uses made in any of the statistical analyses as to overlap, are they in conflict or can they complement water regimen schedules?

LUCAS2-2

My third chart will have to be submitted for the Upper Guadalupe River project deadline in September. It is what I think your measured flow and water temperature data in Appendix 1, Volume 2, should incorporate, along with water quality and chemistry. I am not comfortable with the science in any of these 'monthly percentiles of daily Guadalupe River flows' and thermal suitability and simulated temperature graphs, or the Volume 1, Chapter 4 hydrologic and hydraulic conditions, as it is unclear how the base data of IBM/Fairchild flows, Los Gatos Creek flows are weighted.

LUCAS2-3

The thermal impacts for flows coming out of Los Gatos Creek are positive for fish, but how much cooler are these flows? How clean are these flows chemically? The Los Gatos Creek watershed is characterized as being purely residential but the car wash, the industrial park for Campbell, the highway runoff from #17 and #85 and any old and new little businesses from downtown San Jose to the Santa Cruz mountains can contribute unknown quantities of chemical suds. Water quality needs to be assessed.

LUCAS2-4

The California State Water Resources Control Board's Toxic Substances Monitoring Program 1984 report listed the Guadalupe River as having copper, lead, mercury, Chlordane, Lindane and PCB's exceeding EDL 85, FDA action level or NAS guidelines. The USGS data from 1978 to 1991 appears to have been collected along the full range of chemical constituents of the Guadalupe River water at the St. John Street gage. Thermal conditions have a direct correlation with the negative impacts of certain chemicals on the ecosystem of the river and on San Francisco Bay ultimately. And, it would appear that this data was collected in support of the COE activities in flood control for this river. How is this reflected in this EIR? Is a supplement analysis indicated? Mercury can be called 'naturally occurring', but not the rest?

LUCAS2-5

Chart 4 is of the trees counted in the project area for the Park of the Guadalupe EIR, and as this recreation plan is incorporated into this full project it would be important to have an update on this riparian resource and the ordinance trees. Is this somewhere in the EIR that I have missed, or is it reflected somehow in the SRA discussions? If not, this is a deficiency and such a report should be included.

LUCAS2-6

The riparian corridor of the Guadalupe River was sufficiently lush when I first walked it in 1976 that the sound of the songbirds drowned out all noise and traffic from downtown San Jose. The biodiversity that this river system supported was an amazing resource and a treasure that oldtimers of the community truly valued. I will attempt to assemble some pictures of this period but will send them later, too. It is an archeological dig of sorts as the boxes on this topic fill a garage.

Chart 5 I am sending along as an interim to show the peak summer temperatures in the period of record to be 22.0 C which is not quite lethal for a laggard salmon, but the important temperatures for his sustainability are the low winter temperatures of 10.0 to 13.0 C. This chart shows the worst winter temperatures as it incorporates the IBM/Fairchild 20cfs pumping period when flows heated up down the concrete Canoas Canal. Please plot the low sustainable salmon temperatures of October, November, December, January and February as predicted for the post-project as well as existing in the present conditions, and compare with the baseline water temperatures of 1984-85. If there is a difference can the tree loss account for it?

LUCAS2-7

I believe it is erroneous to have mitigated for the wetlands and riparian losses of the downtown Guadalupe River flood control project on Guadalupe Creek as the intervening thermal conditions and lack of water (due to extreme percolation gravels) make it an improbable success story. As mitigation for the Upper Guadalupe project it has validity. But, now to assess this thermal mortality factor and claim that the Guadalupe River is not suited to a coldwater fishery is poor resource management.

LUCAS2-8

The Los Gatos Creek should be included in this entire exercise as the dominant fish refugia, and as the upper third mile to what remains of the lower two miles of prime coldwater fish habitat that has supported this historic run of salmon and steelhead. Water temperatures of the segment 3 and the Upper Guadalupe River need to be held at a constant, guaranteed temperature level, throughout this entire flood control project, that will not overwhelm the thermal integrity of Los Gatos to Guadalupe River flows. But, this baseline thermal level must be determined by the regulatory agencies, now. Please require this scientific addendum to this EIR.

LUCAS2-9

Sincerely, *Libby Lucas* Libby Lucas, 174 Yerba Santa Ave., Los Altos, CA 94022

PPS Please allow me a continuance for this last packet of pictures and thermal/flow chart with the USGS chemical analysis of 1978-1991. Thank you so much.